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March 16, 2020

BY ECF

Honorable A. Kathleen Tomlinson
United States Magistrate Judge
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: *Jackson v. Nassau County, et al.*, 18 CV 3007 (JS) (AKT)

Your Honor:

I represent plaintiff in the above-referenced matter. I write pursuant to ¶ 11 of the minute entry filed today at DE #270 to respectfully withdraw, without prejudice, plaintiff's motion for sanctions filed at DE #206.

Plaintiff apologizes for the untimeliness of this submission, which was due on March 11, 2020. The undersigned failed to make adequate note of the deadline when the Court set it at the recent status conference and, if it should please the Court, only realized the oversight upon review of the minute entry issued this afternoon.

Further, plaintiff respectfully requests a one-day extension, until tomorrow, for the parties to comply with ¶ 1 of the DE #270 order, which requires the filing of a stipulation of discontinuance as to parties removed through plaintiff's proposed First Amended Complaint. The extension is requested to allow the Nassau County defendants time to draft and circulate a proposed stipulation, which plaintiff expects to receive, review, execute and return for filing tomorrow.

Thank you for your consideration of this request.

Respectfully submitted,


Gabriel P. Harvis

cc: All Counsel